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*Attorneys for Defendant-Intervenor-Applicant  
Lithium Nevada Corp.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

BARTELL RANCH, LLC, a Nevada  
limited liability company and EDWARD  
BARTELL,

Plaintiffs,

v.

ESTER M. MCCULLOUGH,  
Winnemucca District Manager, Bureau of  
Land Management; BUREAU OF LAND  
MANAGEMENT,

Defendants,

and

LITHIUM NEVADA CORP.,

Defendant-Intervenor-Applicant.

**Case No. 3:21-cv-00080-MMD-CLB**

**LITHIUM NEVADA CORP.'S REPLY  
IN SUPPORT OF MOTION TO  
INTERVENE**

Lithium Nevada Corp. (“Lithium Nevada”) hereby replies in support of its motion for leave to intervene as a defendant in the above-captioned action as a matter of right pursuant to Fed. R. Civ. P. 24(a)(2), or, in the alternative, pursuant to Fed. R. Civ. P. 24(b) (the “Motion”). As noted in the Motion, Federal Defendants have indicated to counsel for Lithium Nevada that they take no position on the Motion. Consistent with that, the March 29, 2021, deadline for filing a response to the Motion has expired and the Federal Defendants have not filed any opposition. Further, Plaintiffs filed a notice of non-opposition to the Motion on March 25, 2021. *See* ECF No. 17. Accordingly, Lithium Nevada understands the Motion to be unopposed and has attached a proposed order hereto as Exhibit 1 for the Court’s consideration, in accordance with U.S. District Judge Miranda M. Du’s Civil Standing Order No. 1, dated April 24, 2018.

DATED this 1st day of April, 2021.

By: /s/ Laura K. Granier

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*Attorneys for Defendant-Intervenor-  
 Applicant  
 Lithium Nevada Corp.*

**Certificate of Service**

I hereby certify that on April 1, 2021, I filed the foregoing using the United States District Court CM/ECF, which caused all counsel of record to be served electronically.

/s/ Laura K. Granier

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**EXHIBIT INDEX****EXHIBIT****DESCRIPTION****# OF PAGES**

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[Proposed] Order Granting Lithium  
Nevada Corp.'s Motion to Intervene

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